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12
13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA
15 SAN JOSE DIVISION

16 *In re Google Generative AI Copyright*
17 *Litigation*

Master File Case No.: 5:23-cv-03440-EKL
Consolidated with Case No.: 5:24-cv-02531-EKL

18 **STIPULATION AND [PROPOSED]**
19 **ORDER REGARDING SEALING IN**
20 **CONNECTION WITH ECF NOS.**
21 **249 AND 253**

22 Judge: Hon. Eumi K. Lee
23 Magistrate Judge: Hon. Susan van Keulen
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1 The Parties, by and through their undersigned counsel, stipulate as follows:

2 WHEREAS, on October 15, 2025, Plaintiffs filed an Administrative Motion to Consider
3 Whether Another Party's Material Should Be Filed Under Seal (ECF No. 253) in connection with
4 their Motion for Class Certification (ECF No. 249);

5 WHEREAS, the Parties anticipate that multiple administrative motions to seal and
6 responses covering many documents and deposition excerpts may be required in connection with
7 proceedings over ECF No. 249 and understand that, in such circumstances, courts in this district
8 have directed the filing of a single, joint motion to seal upon completion of briefing;

9 WHEREAS, the Parties have agreed and respectfully ask the Court's approval that any
10 sealing issues relating to documents filed in connection with the briefing on Plaintiffs' Motion for
11 Class Certification, including those identified in Plaintiffs' Administrative Motion to Consider
12 Whether Another Party's Material Should Be Filed Under Seal (ECF No. 253), be addressed via a
13 joint omnibus motion to seal that the Parties will file by January 19, 2026. Any response to the
14 joint omnibus motion shall be filed jointly by February 2, 2026.

15 IT IS SO STIPULATED.
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Respectfully submitted,

Dated: October 17, 2025

By: /s/ Paul J. Sampson

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Dated: October 17, 2025

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SIGNATURE ATTESTATION

I, Paul J. Sampson, am the ECF User whose ID and password are being used to file this document. In compliance with N.D. Cal. Civil L.R. 5-1(i)(3), I hereby attest that the concurrence in the filing of this document has been obtained from the other signatory.

By: /s/ Paul J. Sampson
Paul J. Sampson

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____, 2025

Hon. Eumi K. Lee
United States District Court Judge